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**IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF NEW JERSEY**

JAMES T. GENGO,
*Individually and on Behalf of
All Others Similarly Situated,*

Plaintiff(s),

v.

JETS STADIUM DEVELOPMENT, LLC and
NEW YORK JETS LLC,

Defendants.

Civil Action No. 2:18-cv-08012-SRC-CLW

**DECLARATION OF ANDREW L. LEE IN
SUPPORT OF THE ADMISSION OF
COUNSEL *PRO HAC VICE***

ANDREW L. LEE, hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a member of the New York State Bar, and the Founding Partner of ALL Counsel P.C. located in New York, New York. I submit this Declaration in support of my application for admission *pro hac vice*.

2. I am the Founding Partner of the law firm of All Counsel P.C., and I maintain my office at 8 West 126th Street, New York, New York 10027.

3. I am a member in good standing of the New York State Bar and have been a member of that Bar since 1998.

4. As required by Local Civil Rule 101.1(c)(1), attached to this Declaration as Exhibit A is a list of the names and addresses of the official(s) and/or office(s) maintaining the roll(s) of the members of the bar of each state, and of each federal court, in which I am admitted to practice.

5. No disciplinary action has ever previously been imposed on me in any jurisdiction, and I know of no disciplinary action pending against me in any jurisdiction. I am not under suspension or disbarment of any court. I am not eligible for admission to the bar of this Court because I am not licensed to practice in New Jersey.

6. Defendants Jets Stadium Development, LLC (“JSD”) and New York Jets LLC (“Jets LLCs”), have requested that I represent it in this litigation so that it may have the benefit of any experience, knowledge and expertise in sports law and litigation.

7. I shall abide by all applicable Rules of Court, including local rules and all disciplinary rules, in the course of my representation of JSD and Jets LLC in this action. I recognize that all lawyers admitted *pro hac vice* before this Court are within the disciplinary jurisdiction of this Court.

8. I shall notify the Court immediately of any matter affecting my standing at the Bar of any Court.

10. Pursuant to Local Civil Rule 101.1(c), I designate Ronald J. Levine, Esq. of Herrick, Feinstein LLP, One Gateway Center, Newark, New Jersey 07102, as a member of the Bar of this Court maintaining a *bona fide* office within the U.S. District Court for the District of

New Jersey, upon whom all notices, orders and pleadings may be served, and who may be required to attend before this Court, Clerk or other officer of this Court.

11. I understand my obligations under Local Civil Rule 101.1(c). If admitted *pro hac vice*, payment for such admission shall be promptly remitted to the Clerk, United States District Court, pursuant to Local Rule 101.1(c), and to the New Jersey Lawyer's Fund for Client Protection ("NJLFCP") pursuant to New Jersey Court Rule 1:28-2. I shall continue to make the required annual payments to the NJLFCP for any year in which I continue to represent JSD and Jets LLC in this matter.

12. I agree to take no fee in any tort case before this Court in excess of New Jersey Court Rule 1:21-7 governing contingent fees.

13. Based on the foregoing, together with the supporting documents forwarded herewith, I respectfully request that the Court grant my application to appear *pro hac vice* on behalf of JSD and Jets LLC in the above-captioned matter.

I DECLARE under penalty of perjury, that the foregoing is true and correct.

Executed at New York, New York, this 16th day of May, 2018.

A handwritten signature in blue ink, appearing to read "Andrew L. Lee". The signature is fluid and cursive, with a large, sweeping flourish on the left and a smaller, more vertical section on the right.

Andrew L. Lee

EXHIBIT A

ANDREW L. LEE**ADMITTED TO PRACTICE BEFORE THE FOLLOWING COURTS**

<u>COURT</u>	<u>DATE OF ADMISSION</u>	<u>GOOD STANDING</u>
New York State Courts New York State Supreme Court Appellate Division, First Judicial Dep't 27 Madison Avenue New York, NY 10010	November 16, 1998	Yes
U.S. District Court Southern District of New York 500 Pearl Street New York, New York 10007	Fall 1998	Yes
U.S. District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201	Fall 1998	Yes
U.S. Court of Appeals, Fifth Circuit 600 S. Maestri Place New Orleans, LA 70130	Fall 1998	Yes
U.S. Court of Appeals, D.C. Circuit E. Barrett Prettyman Federal Courthouse Washington, D.C. 20001	January 2011	Yes
United States District Court Eastern District of Michigan Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd. Detroit, MI 48226	February 2017	Yes